



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

April 19, 2013

KEITH A. DAVIS, TREASURER
NATIONAL REPUBLICAN CONGRESSIONAL
COMMITTEE
320 FIRST STREET SE
WASHINGTON, DC 20003

Response Due Date
05/24/2013

IDENTIFICATION NUMBER: C00075820

REFERENCE: 30 DAY POST-GENERAL REPORT (10/18/2012 - 11/26/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 6 item(s):

1. Schedule A of your report (see attached) discloses a contribution from an individual(s) who have a mailing address outside of the United States of America. Please be advised that 2 U.S.C. §441e(a) and 11 CFR §110.20 prohibit foreign nationals from making contributions in connection with any election for political office or in connection with any primary election, convention, or caucus held to select candidates for any political office.

If the apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a contribution from a foreign national, you must refund the impermissible contribution to the donor in accordance with 11 CFR §103.3(b). Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund. In addition, any refunds should be disclosed on Schedule B supporting Line 28 of the report during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action on your part to refund or provide clarifying information concerning these contributions will be taken into

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consideration.

2. Schedule A of your report discloses one or more contributions which appear to be a corporation(s) (see attached). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation. Limited liability companies (LLC's) that choose to be treated as corporations under the Internal Revenue Service rules, or have shares that are traded publicly, are considered corporations. In the event that the LLC is treated as a partnership under IRS rules, the aforementioned contributions are to be attributed to each member in direct proportion to his or her share of the LLC's profit or by agreement of its members. Each member who has contributed in excess of \$200 for the calendar year should be identified by name, address, amount of contribution, name of employer, occupation and aggregate total on Schedule A. (11 CFR §110.1(g)(1) through (5))

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the transfer-out or refund. In addition, any transfers-out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of prohibited contributions, prompt action by your committee to transfer-out or refund the amount will be taken into consideration.

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3. Schedule A of your report (see attached) discloses one or more contributions which appears to be from a corporation(s). 2 U.S.C. §441b(a) prohibits the receipt of contributions from corporations unless made from a separate segregated fund established by the corporation.

If any apparently prohibited contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have received a prohibited contribution(s), you may have to make a refund. If within 30 days of receipt you (1) transferred the prohibited amount to an account not used to influence federal elections, and (2) provided written notice to the person making the contribution of the option of receiving a refund, you may retain the contribution in an account not used to influence federal elections. Any request from a donor for a refund must be honored.

If the foregoing conditions for transfers to a non-federal account were not met within 30 days of receipt, the prohibited amount must be refunded. (11 CFR §103.3(b)(1))

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of your check for any transfer out or refund. In addition, any transfers out or refunds should be disclosed on Schedule B supporting Line 22 or 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action concerning the acceptance of a prohibited contribution, prompt action by your committee to transfer out or refund the amount will be taken into consideration.

4. Schedule A of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(f) and 11 CFR §110.1(c) prohibit a political committee which is established and maintained by a national political party, and any affiliated committees, from accepting contributions from a person or non-multicandidate political committee in excess of \$30,800 in a calendar year.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information.

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If any contribution you received exceeds the limits, you may have to refund the excessive amount. The funds can be retained if within 60 days of receipt, (1) the excessive amount was properly reattributed to another person, such as a joint account holder, by obtaining signed written authorizations from each person making the contribution pursuant to 11 CFR 110.1(k)(3), and (2) the treasurer informs the person making the contribution that he or she may request the return of the excessive portion of the contribution if it is not intended to be a joint contribution. Any request from a donor for a refund must be honored.

If the foregoing conditions for reattributions were not met within 60 days of receipt, the excessive amount must be refunded. (11 CFR §103.3(b))

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of your check for the refund. In addition, any reattributions should be reported as memo entries on Schedule A of the report covering the period during which the authorization for the reattribution is received. Any refunds should be disclosed on Schedule B supporting 28 of the report covering the period during which the transaction was made.

Although the Commission may take further legal action regarding the acceptance of an excessive contribution(s), prompt action by your committee to seek reattribution or refund the excessive amount will be taken into consideration.

5. The limitation on making coordinated party expenditures on behalf of a House candidate in the State of North Carolina for the 2012 General election is \$91,200.00. Your reports, however, disclose coordinated party expenditures made on behalf of "David Rouzer" totaling \$93,496.38, which appear to exceed the limitations under 2 U.S.C. §441a(d) (see attached).

If any apparently excessive expenditure in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If you have made an excessive coordinated party expenditure, you must notify the candidate and request a refund of the amount in excess of the limitation.

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund request sent to the candidate. In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received.

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Although the Commission may take further legal action concerning the excessive coordinated party expenditures, prompt action in obtaining a refund will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

6. Schedule F supporting Line 25 of your report discloses a coordinated expenditure(s) on behalf of several candidates (see attached), which appears to have been made after the general election date. Please be advised that if a service is provided or a communication is aired in one reporting period and the payment is made in a later reporting period, the coordinated expenditure should be reported as a memo entry on Schedule F when the service is provided or the communication is publicly disseminated or distributed, and on a Schedule D if it is a reportable debt under 11 CFR §104.11. When the payment for the coordinated expenditure is made, the report should show a payment on Schedule F and the same payment on Schedule D, if applicable.

Please amend your report to provide further clarifying information regarding the coordinated expenditures disclosed after the general election date.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1172.

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Sincerely,

A handwritten signature in black ink, consisting of a series of loops and curves, likely representing the name Alexandra Broomhead.

Alexandra Broomhead
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

Excessive, Prohibited, and Impermissible Contributions
National Republican Congressional Committee (C00075820)

Contributions from Possible Foreign Nationals

Contributor Name	Date	Amount	Report
C. MOORE BACON	10/26/12	\$7,100.00	30 Day Post-General
MR. L. BROOKS ENTWISTLE	11/2/12	\$4,600.00	30 Day Post-General

Excessive, Prohibited, and Impermissible Contributions
National Republican Congressional Committee (C00075820)

Contributions from Possible Prohibited Entities (Corporations, Labor Organization, LLCs)

Contributor Name	Date	Amount	Report
BGR GOVERNMENT AFFAIRS LLC	10/19/12	\$7,500.00	30 Day Post-General
O'SHAUGHNESSY FAMILY PARTNERS, LLC	10/19/12	\$5,000.00	30 Day Post-General
UNITED LIGHTING CO INC	10/29/12	\$1,203.84	30 Day Post-General

Excessive, Prohibited, and Impermissible Contributions
National Republican Congressional Committee (C00075820)

Excessive Contributions from Individuals

Contributor Name	Date	Amount	Report
Mr. Paul E. Purcell	10/23/12	\$2,500.00	2012 30 Day Post-General
Mr. Paul E. Purcell	10/23/12	\$30,800.00	2012 30 Day Post-General

Excessive Coordinated Expenditures with an Affiliated Committee
National Republican Congressional Committee (C00075820)

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
David Rouzer	10/3/12	\$35,000.00	G2012	2012 12 Day Pre- General	C00075820
David Rouzer	10/11/12	\$48,200.00	G2012	2012 12 Day Pre- General	C00075820
David Rouzer	10/15/12	\$7,096.43	G2012	2012 12 Day Pre- General	C00038505
David Rouzer	11/19/12	\$3,199.95	G2012	2012 30 Day Post- General	C00075820

Coordinated Expenditures Made After General Election
National Republican Congressional Committee (C00075820)

Candidate Name	Date	Amount	Election	Election Date
BRIAN P BILBRAY	11/8/12	\$1,500.00	G2012	11/6/2012
CHIP CRAVAACK	11/8/12	\$2,000.00	G2012	11/6/2012
RICKY GILL	11/8/12	\$1,143.05	G2012	11/6/2012
RICKY GILL	11/8/12	\$1,127.57	G2012	11/6/2012
MICHAEL GRIMM	11/8/12	\$2,375.00	G2012	11/6/2012
RICHARD HUDSON	11/8/12	\$2,130.03	G2012	11/6/2012
STEVE KING	11/8/12	\$2,000.00	G2012	11/6/2012
JAMES B RENACCI	11/8/12	\$5,155.55	G2012	11/6/2012
SCOTT R TIPTON	11/15/12	\$2,195.61	G2012	11/6/2012
RANDOLPH ALTSCHULER	11/19/12	\$2,203.20	G2012	11/6/2012
LEE ANDERSON	11/19/12	\$1,333.20	G2012	11/6/2012
JOHN H ARCHER, JR	11/19/12	\$466.62	G2012	11/6/2012
GARLAND ANDY BARR	11/19/12	\$1,533.18	G2012	11/6/2012
JUDY BIGGERT	11/19/12	\$2,466.62	G2012	11/6/2012
BRIAN P BILBRAY	11/19/12	\$350.00	G2012	11/6/2012
BRIAN P BILBRAY	11/19/12	\$1,985.87	G2012	11/6/2012
FRANCISCO QUICO CANSECO	11/19/12	\$1,200.00	G2012	11/6/2012
MIKE COFFMAN	11/19/12	\$1,574.99	G2012	11/6/2012
CHRISTOPHER COLLINS	11/19/12	\$2,666.66	G2012	11/6/2012
CHIP CRAVAACK	11/19/12	\$466.62	G2012	11/6/2012
RODNEY DAVIS	11/19/12	\$2,466.62	G2012	11/6/2012
JEFF DENHAM	11/19/12	\$2,466.62	G2012	11/6/2012
MATT DOHENY	11/19/12	\$1,466.61	G2012	11/6/2012
ROBERT JAMES DOLD	11/19/12	\$2,466.62	G2012	11/6/2012
MICHAEL G FITZPATRICK	11/19/12	\$350.00	G2012	11/6/2012
RICKY GILL	11/19/12	\$1,233.33	G2012	11/6/2012
RICKY GILL	11/19/12	\$233.33	G2012	11/6/2012
RICKY GILL	11/19/12	\$233.33	G2012	11/6/2012
MICHAEL GRIMM	11/19/12	\$799.92	G2012	11/6/2012
NAN HAYWORTH	11/19/12	\$3,133.32	G2012	11/6/2012
RICHARD HUDSON	11/19/12	\$1,449.91	G2012	11/6/2012
BILL JOHNSON	11/19/12	\$1,233.33	G2012	11/6/2012
STEVE KING	11/19/12	\$466.62	G2012	11/6/2012
THOMAS P LATHAM	11/19/12	\$1,850.00	G2012	11/6/2012
MIA LOVE	11/19/12	\$1,466.61	G2012	11/6/2012
ABEL MALDONADO	11/19/12	\$2,462.21	G2012	11/6/2012
VERNON PARKER	11/19/12	\$2,466.62	G2012	11/6/2012

Coordinated Expenditures Made After General Election
National Republican Congressional Committee (C00075820)

Candidate Name	Date	Amount	Election	Election Date
JASON PLUMMER	11/19/12	\$1,400.06	G2012	11/6/2012
JAMES B RENACCI	11/19/12	\$2,600.00	G2012	11/6/2012
EDWARD SCOTT RIGELL	11/19/12	\$233.00	G2012	11/6/2012
ANDREW RORABACK	11/19/12	\$2,466.62	G2012	11/6/2012
KEITH J ROTHFUS	11/19/12	\$1,100.00	G2012	11/6/2012
DAVID ROUZER	11/19/12	\$3,199.95	G2012	11/6/2012
ROBERT T SCHILLING	11/19/12	\$466.62	G2012	11/6/2012
ANTHONY STRICKLAND	11/19/12	\$2,666.66	G2012	11/6/2012
DANNY TARKANIAN	11/19/12	\$2,466.62	G2012	11/6/2012
SCOTT R TIPTON	11/19/12	\$1,850.00	G2012	11/6/2012
SCOTT R TIPTON	11/19/12	\$3,350.00	G2012	11/6/2012
GARY MILLER	11/26/12	\$1,164.46	G2012	11/6/2012